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PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

SCHAEFER BRUSH MANUFACTURING COMPANY, INC. (FORMERLY GTE AUTOMATIC ELECTRIC, INC.) WAUKESHA, WISCONSIN WID 006 075 642

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	WID 006 075 642
Date Prepared	:	March 22, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087WI2P
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#268

(WID 006 075 643)

OCTOBER 29, 1998

MEMORANDUM:

SUBJECT: RIN-149-99 - PA/VSI - SCHAEFER BRUSH MANUFACTURING COMPANY, INC.

FROM: LOUISE SMITH, SM-4J

TO: MARY VILLARREAL, DR-7J

Please review the Enforcement Confidential designated sections of this report and provide me with a release determination. Thank you.

Attachment

The site has been on Low priority since 1992. It is releasable

Mary V
11/2/98

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Schaefer Brush Manufacturing Company, Inc. (Schaefer), facility [formerly GTE Automatic Electric, Inc. (GTE)] in Waukesha, Waukesha County, Wisconsin. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

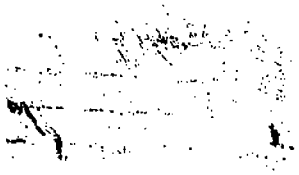
Schaefer purchased the facility in July 1981 and began manufacturing brushes for industrial and commercial use in November 1982. The brushes are made from wire, nylon, polypropylene, natural fibers, and animal hair. Nonhazardous wastes, including scrap metal, used compressor oil, are currently generated at the facility from brush manufacturing. The Schaefer facility is not regulated under Resource Conservation and Recovery Act (RCRA) and generates only nonhazardous wastes. There has been no CERCLA activity at the facility. The facility has operated at its current location since 1982 and employs about 65 people.

The facility occupies 5 acres in a mixed-use area in Waukesha, Wisconsin. The City of Waukesha has a population of about 57,000. The nearest residence is about 700 feet south of the facility. Wisconsin Industrial School and Whittier Elementary School are about 1 mile north and east of the facility, respectively. The building is secured nightly with an alarm system; the facility is accessible from the west and south by Prairie and Progress Avenues, respectively.

The nearest surface water body, the Fox River, is located about 0.5 mile west-northwest of the facility and is used for recreational purposes.

Ground water is used as a municipal water supply. The nearest municipal water well is located about 0.5 mile northeast of the facility. It is not known if the well is located upgradient or downgradient of the facility. Industrial facilities near the facility obtain water from the City of Waukesha Water Department. Available well data indicate no active industrial wells within 1 mile of the facility.

No sensitive environments are located on site. Wetlands greater than 2 acres in size are located within 2 miles of the facility, to the northwest, north, and south.



When the facility was owned and operated by GTE from 1957 to 1981, it manufactured electric switching instruments. The GTE facility generated five waste streams: spent tetrachloroethylene (F002), spent ethyl acetate (F003), spent methyl ethyl ketone (MEK) (F005), spent methanol (D001), and nonhazardous spent ink tubes. GTE stored hazardous waste in the Former Hazardous Waste Storage Area (SWMU 1) of the facility. The facility was closed in 1981 following consolidation at GTE. The Hazardous Waste Storage Area underwent RCRA closure in 1981.

The PA/VSI identified the following six SWMUs at the facility:

Solid Waste Management Units

1. Former Hazardous Waste Storage Area
2. Scrap Metal Satellite Accumulation Drum
3. Scrap Metal Storage Bin
4. Former Solvent Satellite Accumulation Area
5. Former Degreaser Distillation Systems
6. Used Compressor Oil Storage Container

Nonhazardous scrap metal is stored in the Scrap Metal Satellite Accumulation Drum (SWMU 2) and Scrap Metal Storage Bin (SWMU 3). No signs of release were apparent in these areas. The Former Solvent Satellite Accumulation Area (SWMU 4) and the Former Degreaser Distillation Systems (SWMU 5) were not in place during the VSI. Because the Former Hazardous Waste Storage Area (SWMU 1) no longer stores hazardous waste and SWMUs 4 and 5 are no longer in place, the potential for release to all environmental media from these SWMUs is low. Because SWMUs 2, 3 and 6 store nonhazardous wastes only, the potential of release from these SWMUs is also low.

The potential for release of hazardous constituents from the facility to ground water, surface water, air, and on-site soils, is low. No documented releases have occurred at the facility, and the VSI revealed no visual signs of a release. PRC recommends that no further action be taken for the facility at this time, except that AG Communication Systems, Inc., the successor to GTE, should conduct file searches to provide additional data on SWMUs 4 and 5.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Schaefer Brush Manufacturing Company, Inc. (Schaefer), facility, [EPA Identification No. WID 006 075 642; formerly GTE Automatic Electric, Inc. (GTE)], in Waukesha, Waukesha County, Wisconsin. The PA was completed on June 28, 1992. PRC gathered and reviewed information from the Wisconsin Department of Natural Resources (WDNR); Wisconsin Geological and Natural History Survey (WGNHS); United States Department of Agriculture (USDA); United States Department of Commerce (USDC); Federal Emergency Management Agency (FEMA); AG Communication Systems, Inc. (AGCS, formed by a merger between GTE and AT&T); and EPA Region 5 RCRA files. The VSI was conducted on June 29, 1992. It included interviews with facility

representatives and a walk-through inspection of the facility. PRC identified six SWMUs and no AOCs at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and four inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history, environmental setting; and receptors.

2.1 FACILITY LOCATION

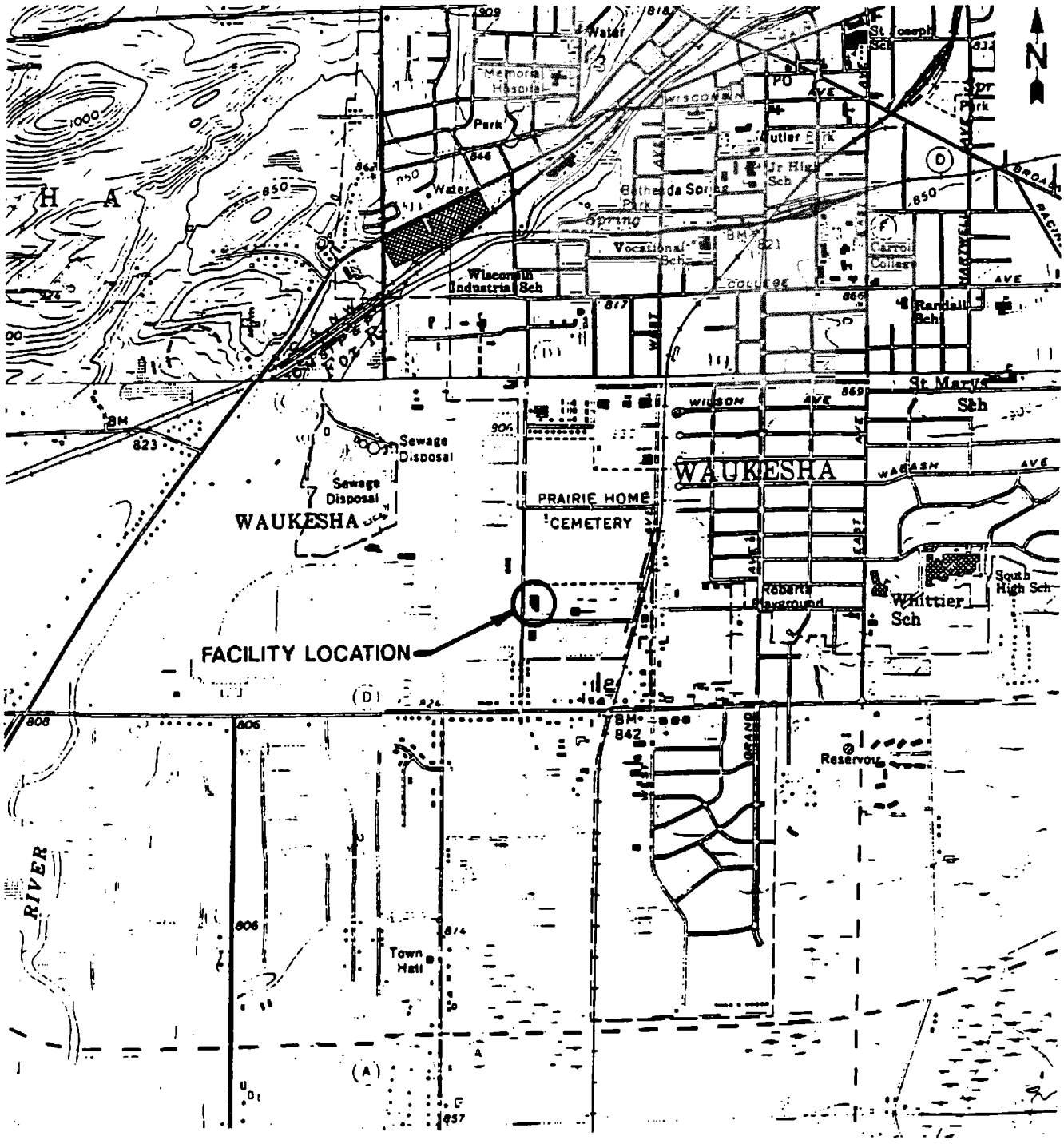
The Schaefer facility is located at 1101 South Prairie Avenue in Waukesha, Waukesha County, Wisconsin (latitude 42° 59' 30" N and longitude 88° 14' 24" W). Figure 1 shows the location of the facility in relation to the surrounding topographic features. The facility occupies about 5 acres in a mixed-use area.

The facility is bordered on the north by Prairie Home Cemetery; on the west by Magnatek Electric, Inc.; on the south by Amron, Inc.; and on the east by Sanofi Bio-Industries.

2.2 FACILITY OPERATIONS

The facility was constructed in 1957 by Automatic Electric. General Telephone & Electric and Automatic Electric merged in 1957 and became GTE Automatic Electric, Inc. (GTE). GTE designed and manufactured central office and private branch exchange (PBX) electromechanical and electronic telephone switching systems. The facility was primarily involved in assembly operations. GTE operated the facility from 1957 to 1981. Under GTE the facility employed about 350 people at maximum production and 260 people in 1981, when GTE consolidated the facility. According to AGCS personnel, construction of the facility building was completed in three phases, but the dates of construction are unknown. Information regarding the use of raw material, storage, and waste storage is not available.

The facility was acquired by Schaefer in July 1981, and assembly operations began in November 1982. Schaefer employs about 65 people on a one-shift schedule. The facility currently consists of a one-story concrete block building with approximately 5,900 square feet of space. A production and assembly area occupy the central portion of the building. A warehouse area is located in the east side of the facility building, but some warehouse space is also reserved in the south end of the building for custom orders awaiting shipment. A wood and machine shop area is located in the south side of the building. An office area is located in the west side of the building. A three-bay loading dock was constructed inside the southeastern corner of the facility in 1980. An employee parking lot is located along the north side of the facility building.



SCALE 1:24000

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

SCALE 1"=2,000'

QUADRANGLE LOCATION

SOURCE: MODIFIED FROM USGS, WAUKESHA, MUSKEGO, HARTLAND, AND GENESEE QUADRANGLES, 1976

SCHAEFER BRUSH MANUFACTURING COMPANY, INC.
(FORMERLY GTE AUTOMATIC ELECTRIC, INC.)
WAUKESHA, WISCONSIN

FIGURE 1

FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

An office parking lot is southwest of the facility building, and a gravel supplemental parking lot is located east of the building. Dumpsters are located east of the building.

Schaefer manufactures brushes for commercial and industrial use. The brushes are manufactured from wire, nylon, polypropylene, natural fibers, and animal hair. Materials used in the manufacturing process are purchased in bulk quantities and cut to size at the facility. Backing for the brushes include leather, metal, and plastic, all of which are manufactured off site. Punch presses, trimmers, and a pad printing press are used in brush production.

Land use prior to construction of the facility is unknown. Solid wastes generated from facility operations, past and current, and the SWMUs where they are managed, are discussed in detail in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

Hazardous wastes generated by the GTE facility included spent tetrachloroethylene (F002), spent ethyl acetate (F003), spent methyl ethyl ketone (MEK) (F005), and spent methanol (D001). Nonhazardous wastes included spent ink tubes (AGCS, 1992). Inventory records provided by AGCS indicate that the distillation stills and rubber stamp cleaning operations were the primary hazardous waste generating operations. Hazardous wastes were stored in 55-gallon drums in the Former Hazardous Waste Storage Area (SWMU 1) in the facility's current loading dock area. The RCRA Part A permit application submitted by GTE indicates that wastes were either landfilled or reclaimed (GTE, 1980). Transporters, landfills, and reclaiming facilities are not known. File reviews and interviews with facility representatives did not provide information on waste handling, disposal activities, or waste generation volumes. The Former Solvent Satellite Accumulation Area (SWMU 4) and Former Degreaser Distillation Systems (SWMU 5) were not identified during the PA. Details pertaining to the location of still(s), satellite accumulation area(s), and types of stills and storage containers are unknown. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

Schaefer generates nonhazardous wastes only, including scrap metal and used compressor oil. Non-metallic fibers from the brush trimming process are disposed of in a dumpster provided by Laidlaw Waste Systems, Inc. (Laidlaw) for general disposal. Scrap metal is containerized in hoppers attached to trimming machines or allowed to collect on the floor. Scrap metal is temporarily stored in the Scrap Metal Satellite Accumulation Drum (SWMU 2) and is eventually stored in the Scrap Metal Storage Bin (SWMU 3), a 20-cubic-yard dumpster provided

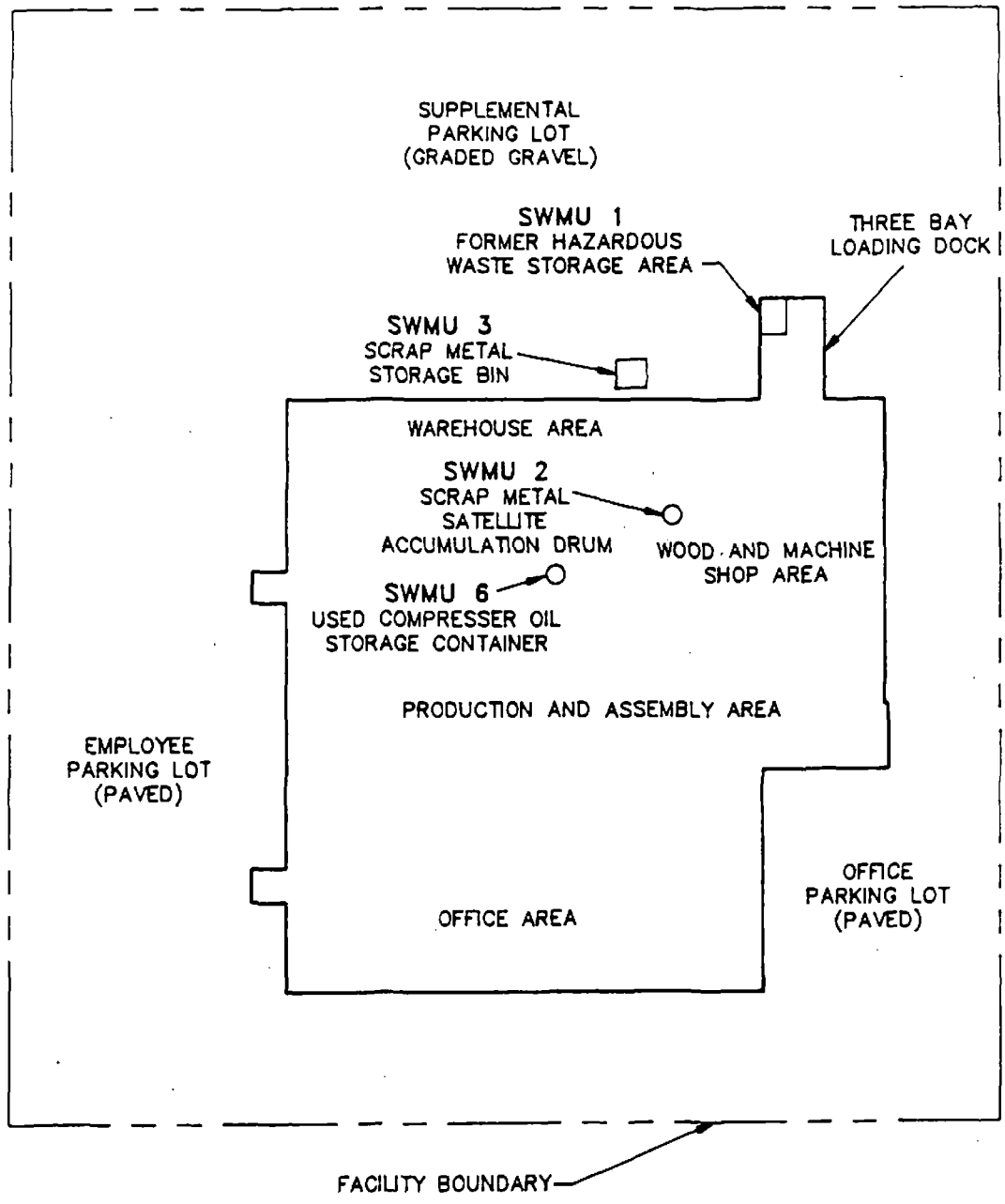
TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Former Hazardous Waste Storage Area	Yes	RCRA closed in 1981
2	Scrap Metal Satellite Accumulation Drum	No	Active; manages nonhazardous waste
3	Scrap Metal Storage Bin	No	Active; manages nonhazardous waste
4	Former Solvent Satellite Accumulation Area	No	Removed in 1981
5	Former Degreaser Distillation Systems	No	Removed in 1981
6	Used Compressor Oil Storage Container	No	Active; manages nonhazardous waste

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



NOTE:
THE FORMER LOCATIONS OF SWMU 4 (FORMER SOLVENT SATELLITE ACCUMULATION AREA) AND SWMU 5 (FORMER DEGREASER DISTILLATION SYSTEM) ARE UNKNOWN.

40' 0 40' 80'
SCALE: 1" = 80'

SOURCE: MODIFIED FROM GTE, 1980

SCHAEFER BRUSH MANUFACTURING COMPANY, INC.
(FORMERLY GTE AUTOMATIC ELECTRIC, INC.)
WAUKESHA, WISCONSIN

FIGURE 2
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

GTEAUTO2.DWG - 09/29/92 - CER - 000-0058/WP2

TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
GTE WASTES		
Spent tetrachloroethylene/F002	Distillation Activities	SWMUs 1, 4, and 5
Spent ethyl acetate/F003	Rubber stamp cleaning operations	SWMUs 1 and 4
Spent MEK/F005	Rubber stamp cleaning operations	SWMUs 1 and 4
Spent methanol/D001	Rubber stamp cleaning operations	SWMUs 1 and 4
Spent ink tubes/NA	Printing operations	SWMU 1
SCHAEFER WASTES		
Scrap metal/NA	Brush assembly	SWMUs 2 and 3
Used compressor oil/NA	Equipment maintenance	SWMU 6

Note:

[a] Not applicable (NA) designates nonhazardous waste.

by Advance Service Corporation (Advance) of Watertown, Wisconsin. The machine shop produces scrap metal on a irregular basis which is stored in the Scrap Metal Storage Bin (SWMU 3).

Oil from compressors at Schaefer is changed on a quarterly basis during equipment maintenance activities. About 4 to 5 gallons of used compressor oil are collected every 6 weeks and stored in a 5-gallon container (SWMU 6) and disposed of at local reclamation centers. About 32 to 40 gallons are reclaimed annually.

2.4 HISTORY OF DOCUMENTED RELEASES

A review of EPA and WDNR files indicates that no documented releases of hazardous waste or waste constituents has occurred at the facility.

2.5 REGULATORY HISTORY

The GTE facility operated as a RCRA treatment, storage, or disposal (TSD) facility. GTE submitted a RCRA Part A permit application on November 18, 1980, that indicates container storage of 1,200 gallons of hazardous waste. The following waste codes are listed on the RCRA Part A permit application: F001, F002, F003, F005, F017, D001, D008, and a variety of U-type wastes (GTE, 1980).

A closure plan for the Former Hazardous Waste Storage Area (SWMU 1) was submitted by GTE to WDNR. The closure plan indicates that nonreclaimable wastes were to be shipped to GTE's Northlake, Illinois, facility. Wastes were then to be manifested to a licensed landfill or incinerator (GTE, 1982). Files indicate that 10 drums of hazardous waste from this GTE facility and another GTE facility were shipped from these same two facilities to the Northlake, Illinois, facility on June 30, 1981, and 10 drums were shipped on July 30, 1981 (WDNR, 1985a). A registered professional engineer from Donohue and Associates, Inc., attested to the removal of the drums according to the closure plan (GTE, 1982). GTE requested that the facility be removed from EPA Region 5 files, and that its status as a TSD facility be cancelled (GTE,1981). WDNR performed a TSD nonactivity follow-up inspection of the facility in 1985 (WDNR, 1985b). The facility's regulatory status was determined to be "closed" by WDNR on the basis of the inspection. WDNR notified EPA Region 5 of the facility's change in status (WDNR, undated).

The file review indicates that the facility under the ownership of GTE did not receive any compliance inspections. The facility had no active air permits, and no history of odor complaints from area residents. The facility has not been required to operate under a Wisconsin

Pollutant Discharge Elimination System (WPDES) permit. The facility has no history of the usage of underground storage tanks. The wastes generated by Schaefer are nonhazardous. The Schaefer facility is not regulated under Resource Conservation and Recovery Act (RCRA). There has not been any CERCLA activity at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Waukesha County is continental. The average daily temperature is 46.9 degrees Fahrenheit (°F). The lowest average daily temperature is 20.7°F in January. The highest average daily temperature is 72.1°F in July (USDA, 1971).

The total annual precipitation for the county is 30.07 inches. The mean annual lake evaporation for the area is about 29 inches. The 1-year, 24-hour maximum rainfall is about 2 inches (USDC, 1968).

The prevailing wind is westerly in the winter and southerly in summer. Average wind speed is highest in March, April, and November, at 16 miles per hour (USDA, 1971).

2.6.2 Flood Plain and Surface Water

The nearest surface water body, the Fox River, is located about 0.5 mile west-northwest of the facility and is used for recreational purposes. The Fox River discharges into the Illinois River at LaSalle-Peru, Illinois, about 140 miles from the site. The facility is not within a 100- or 500-year flood plain (FEMA,1982).

The facility is relatively level and has storm sewers at the east of the property and the three-bay loading dock area. Storm sewers at the facility discharge into a drainage ditch on the western side of Prairie Avenue and eventually into the Fox River about 1 mile northwest of the facility (PRC, 1992). Roof drains at the facility are connected to the sanitary sewer system. Sanitary sewer effluent is treated at the City of Waukesha waste water treatment plant.

2.6.3 Geology and Soils

USDA records indicate that the facility lies on outwash plains and river terraces consisting of well-drained soils. These soils of the Warsaw-Lorenzo Association are comprised of the Warsaw silt loam and Lorenzo loam, and have a subsoil of clay loam. The Warsaw silt loam and the Lorenzo loam are both present on site. Warsaw silt loam is slightly droughty and mottled. Lorenzo loam is droughty with medium runoff (USDA, 1971). Quaternary Period glacial deposits consisting of clay, silt, sand, and gravel are situated directly beneath the Warsaw-Lorenzo Association.

Bedrock underlies the Quaternary Period glacial deposits at depths ranging from 30 to 87 feet below ground surface (bgs) in the vicinity of the site (WGNHS, 1992). The formation, geologic age, and approximate thickness of bedrock near the facility is as follows: Niagara-Cayugan-Alexandrian Series (Silurian limestone), 175 feet; Maquoketa Shale (Ordovician Period), 200 feet; Galena-Platteville Formation (Ordovician Period dolomite), 260 feet; St. Peter Sandstone (Ordovician Period), 160 feet; Eau Claire and Mt. Simon Formations (Cambrian Period sandstone), 1,164 feet (WGNHS, 1992). The Maquoketa Shale is an aquitard consisting of shale interbedded with dolomite beds. The Cambrian, Ordovician, and Silurian sandstones and limestones are considered bedrock aquifers, although their capacities and usage vary regionally.

2.6.4 Ground Water

The Niagara Series is the bedrock aquifer previously used as a source of private drinking water in the vicinity of the facility. The capacity of the private drinking wells ranges from 6 to 300 gallons per minute (WGNHS, 1992). According to the City of Waukesha Water Department, residents in the area are supplied with city water. The Cambrian Period sandstone supplies the high-capacity aquifer that Waukesha uses for its city water supply. A detailed well log indicates that a City of Waukesha municipal well is 1,995 feet bgs about 0.5 mile northeast of the facility (WGNHS, 1992).

Available regional information on the Cambrian Period sandstone indicates that recharge to the aquifer is from vertical leakage from the glacial drift in the western part of the county where the Maquoketa Shale is absent. Ground water in this aquifer occurs under artesian conditions where the Maquoketa Shale is present and under semiartesian conditions in the western part of the county. The transmissivity of the aquifer ranges from 670 to 4,700 square feet per day. The hydraulic conductivity of the aquifer ranges from 8 to 25 gallon/day/square foot. The stratigraphic thickness of the sandstone aquifer ranges from less than 400 feet in the northwest

portion of the county to more than 2,400 feet in the southeast portion of the county (WGNHS, 1975). The ground-water flow direction in the facility's vicinity is unknown.

2.7 RECEPTORS

The facility occupies 5 acres in a mixed-use area in Waukesha, Waukesha County, Wisconsin. The City of Waukesha has a population of about 57,000. The facility currently employs 65 people and formerly 260 when GTE ceased its operations at this location.

The facility is bordered on the north by Prairie Home Cemetery; on the west by Magnatek; on the south by Amron, Inc; and on the east by Sanofi Bio-Industries. The nearest residence is about 700 feet south of the facility. Wisconsin Industrial School and Whittier Elementary School are about 1 mile north and east of the facility, respectively. The building is secured nightly with an alarm system; the facility is accessible from the west and south by Prairie and Progress Avenues, respectively.

The nearest surface water body, the Fox River, is located about 0.5 mile west-northwest of the facility and is used for recreational purposes.

Ground water is used as a municipal water supply. The nearest municipal water well is located about 0.5 mile northeast of the facility. It is not known if the well is located upgradient or downgradient of the facility. Industrial facilities near the facility obtain water from the City of Waukesha Water Department. Available well data indicate no active industrial wells are within 1 mile of the facility (WGNHS, 1992).

No sensitive environments are located on site. Wetlands greater than 2 acres in size are located within 2 miles of the facility to the northwest, north, and south. These wetlands are classified as emergent, narrow-leaved, and persistent (WDNR, 1979).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the six SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1	**Former Hazardous Waste Storage Area**
Unit Description:	According to the closure plan submitted by GTE in 1982, this unit was an 8- by 12-foot concrete pad inside the southeast corner of the building near the three-bay loading dock (see Photograph No. 1). Drums were stored on wooden pallets. The unit had a maximum capacity of twenty 55-gallon drums.
Date of Startup:	This unit began operation sometime before 1980. The exact date of startup is unknown.
Date of Closure:	This unit was closed in 1981.
Wastes Managed:	This unit managed spent tetrachloroethylene (F002), spent ethyl acetate (F003), spent MEK (F005), and spent methanol (D001). This unit also manages nonhazardous spent ink tubes.
Release Controls:	Other than the concrete pad, the unit had no secondary containment.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, PRC noted no evidence of release. This area is currently used by the facility for general storage.
SWMU 2	**Scrap Metal Satellite Accumulation Drum**
Unit Description:	This unit consists of a steel 55-gallon drum west of the production and assembly area in the facility building (see Photograph No. 2).

	The unit accumulates scrap metal generated during the manufacturing and trimming procedures.
Date of Startup:	This unit began operation in about November 1982.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous scrap metal. The scrap metal is later stored in Scrap Metal Storage Bin, SWMU 3.
Release Controls:	This unit is indoors on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, PRC noted no evidence of release.
SWMU 3	**Scrap Metal Storage Bin**
Unit Description:	This unit consists of a 20-cubic-yard dumpster provided by Advance Services Corporation of Watertown, Wisconsin (see Photograph No. 3). The dumpster stores nonhazardous scrap metal produced during manufacturing and trimming activities. The dumpster is east of the facility building.
Date of Startup:	This unit began operation in about November 1982.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous scrap metal, which is periodically removed by Advance Services Corporation.
Release Controls:	This unit has no release controls.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, PRC noted no evidence of release.

SWMU 4	**Former Solvent Satellite Accumulation Area**
Unit Description:	This unit was not in place at the time of the VSI. PRC was unable to photograph this unit. File reviews and interviews with facility representatives did not reveal the unit's dimensions, capacity, construction, and location.
Date of Startup:	This unit began operation sometime before 1980. The exact startup date is unknown.
Date of Closure:	This unit was closed in 1981.
Wastes Managed:	This unit managed spent tetrachloroethylene (F002), spent ethyl acetate (F003), spent MEK (F005), and spent methanol (D001).
Release Controls:	Release controls for the unit are unknown.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit was not observed during the VSI because it could not be located.
SWMU 5	**Former Degreaser Distillation Systems**
Unit Description:	This unit was not in place at the time of the VSI. File reviews and interviews with facility representatives did not reveal the unit's dimensions, capacity, construction, and location.
Date of Startup:	These units began operation sometime before 1980. The exact startup date is unknown.
Date of Closure:	This unit was closed in 1981.
Wastes Managed:	This unit managed spent tetrachloroethylene (F002).
Release Controls:	Release controls for the unit are unknown.

History of Documented Releases:	This unit was not observed during the VSI because it could not be located.
SWMU 6	**Used Compressor Oil Storage Container**
Unit Description:	This unit is a 5-gallon plastic container with a threaded lid. The container stores nonhazardous, used compressor oil, charged out at about 4 to 5 gallons every 6 weeks. Used compressor oil is taken to local recycling facilities by Schaefer personnel. The unit is located along the western wall of the warehouse area, on impervious concrete.
Date of Startup:	This unit began operation in November, 1982.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous used compressor oil.
Release Controls:	This unit is equipped with a threaded cap which seals the container.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, PRC noted no evidence of release.

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified six SWMUs and no AOCs at the Schaefer facility. Background information on the facility's location; operations; waste generation and management; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1 **Former Hazardous Waste Storage Area**

Conclusions: This area was a concrete pad storing 55-gallon drums on wooden pallets. The drums were removed in 1981. The unit has no history of release to the environment. This unit has been removed and does not manage hazardous waste. No signs of release were noted during the VSI. WDNR determined the regulatory status of the facility to be closed. The potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 2 **Scrap Metal Satellite Accumulation Drum**

Conclusions: The potential for release to ground water, surface water, air, and on-site soils is low. This unit stores nonhazardous scrap metal from brush manufacturing. It is located indoors on impervious concrete.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 3 **Scrap Metal Storage Bin**

Conclusions: The potential for release to ground water, surface water, air, and on-site soils is low. This unit is a steel-walled dumpster used to store nonhazardous scrap metal outdoors.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 4 **Former Solvent Satellite Accumulation Area**

Conclusions: The potential for release to ground water, surface water, air, and on-site soils is low because the unit has been removed. Information regarding past releases from this unit is unavailable. This SWMU was not observed during the VSI because facility representatives could not identify its former location.

Recommendations: PRC recommends that AGCS conduct an extensive file search to determine the location, history, and release controls for this SWMU.

SWMU 5 **Former Degreaser Distillation Systems**

Conclusions: The potential for release to ground water, surface water, air, and on-site soils is low. Information regarding past releases from this unit is unavailable. The SWMU was not observed during the VSI because it is no longer in place.

Recommendations: PRC recommends that AGCS conduct an extensive file search to determine the location, history, and release controls for this SWMU.

SWMU 6 **Used Compressor Oil Storage Container**

Conclusions: The potential for release to ground water, surface water, air, and on-site soils is low. This unit has no history of release and stores nonhazardous used compressor oil. The used oil is taken to local oil reclamation centers every 3 months. This unit is situated on impervious concrete inside the facility.

Recommendations: PRC recommends no further action for this SWMU.

TABLE 3
SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Former Hazardous Waste Storage Area	Before 1980 to 1981	None	No further action
2. Scrap Metal Satellite Accumulation Drum	1982 to Present	None	No further action
3. Scrap Metal Storage Bin	1982 to Present	None	No further action
4. Solvent Satellite Accumulation Area	Before 1980 to 1981	None	Complete file search
5. Former Degreaser Distillation Systems	Before 1980 to 1981	None	Complete file search
6. Used Compressor Oil Storage Container	1982 to Present	None	None

REFERENCES

AG Communications Systems, Inc. (AGCS), 1992. PRC File Review of Undated Inventory Records.

GTE Automatic Electric, Inc. (GTE), 1980. RCRA Part A Permit Application, November 10.

GTE, 1981. Letter from James Whitesel to U.S. Environmental Protection Agency (EPA) Region 5, November 12.

GTE, 1982. Letter from James Whitesel to Vince Kalvin, Wisconsin Department of Natural Resources (WDNR), March 4.

Federal Emergency Management Agency (FEMA), 1982. Flood Insurance Rate Map, City of Waukesha, Community Panel No. 550491-0006-R, September 2.

PRC Environmental Management, Inc. (PRC), 1992. Record of Telephone Conversation between Scott Brockway and Jerry Taylor, City of Waukesha Engineering, July 7.

United States Department of Agriculture (USDA), 1971. Soil Survey of Milwaukee and Waukesha Counties, Washington, D.C., July.

United States Department of Commerce (USDC), 1968. Climatic Atlas of the United States.

United States Geological Survey (USGS), 1976 (photorevised). Genesee, Hartland, Muskego, and Waukesha Topographic Maps, 7.5-Minute Series.

WDNR, 1979. Wisconsin Wetland Inventory Map, Township 6 North, Range 19 East, July 6.

WDNR, 1985a. Memorandum from Vince Kalvin to Wayne Ringquest, WDNR, January 14.

WDNR, 1985b. Hazardous Waste Activity Form, Report for Treatment, Storage, or Disposal (TSD) Nonactivity Follow-up Inspection, April 12.

WDNR, Undated. Letter from Arthur H. Glor, Jr., Chief of Solid Waste Management to James Whitesel, GTE.

Wisconsin Geological and Natural History Survey (WGNHS), 1975. Groundwater Resources of Waukesha County, Wisconsin by Joseph B. Gouthier.

WGNHS, 1992. Well Logs for Waukesha Area Wells, Open File, reviewed in June.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FOR 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
WI	WID 006 075 642

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER				
Schaefer Brush Manufacturing Company, Inc. (Schaefer)	1101 South Prairie Avenue				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Waukesha	WI	53187	Waukesha		04
09 COORDINATES: LATITUDE 42°59'30"N	**LONGITUDE** 88°14'24"W				

10 DIRECTIONS TO SITE (Starting from nearest public road)
From State Hwy. 164/59, turn west onto Sunset Drive. Take Sunset to Prairie Avenue, and turn north. Facility is located 1/4 mile north of Sunset, on the corner of Prairie Avenue and Progress Avenue.

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing residential)		
Schaefer	1101 South Prairie Avenue		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Waukesha	WI	53187	(414) 547-3500
07 OPERATOR (If known and different from owner)	**08 STREET (Business, mailing, residential)**		
AG Communication Systems, Inc. (AGCS)	400 N. Wolf Road		
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**
Northlake	IL	60164	(708) 681-7915

13 TYPE OF OWNERSHIP (Check one)
■ A. PRIVATE ☐ B. FEDERAL: _____ (Agency Name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER _____ (Specify) ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)
■ A. RCRA 3010 DATE RECEIVED: unknown (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ___/___/___ (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
■ YES DATE 06/29/92
☐ NO

BY (Check all that apply)
☐ A. EPA ■ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)

CONTRACTOR NAME(S): PRC Environmental Management, Inc. (PRC)

02 SITE STATUS (Check one)
■ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION
1957 (BEGINNING YEAR) | Present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
Tetrachloroethylene, ethyl/acetate, methyl ethyl ketone, methanol

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
PRC did not observe any visual signs of contamination at the facility. The placement of the degreaser systems and solvent satellite storage area were not located during the PA/VSI.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)
☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ■ C. LOW (Inspect on time-available basis) ☐ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Scott J. Brockway		PRC	(414) 821-5894	09 / 25 / 92 (MONTH DAY YEAR)

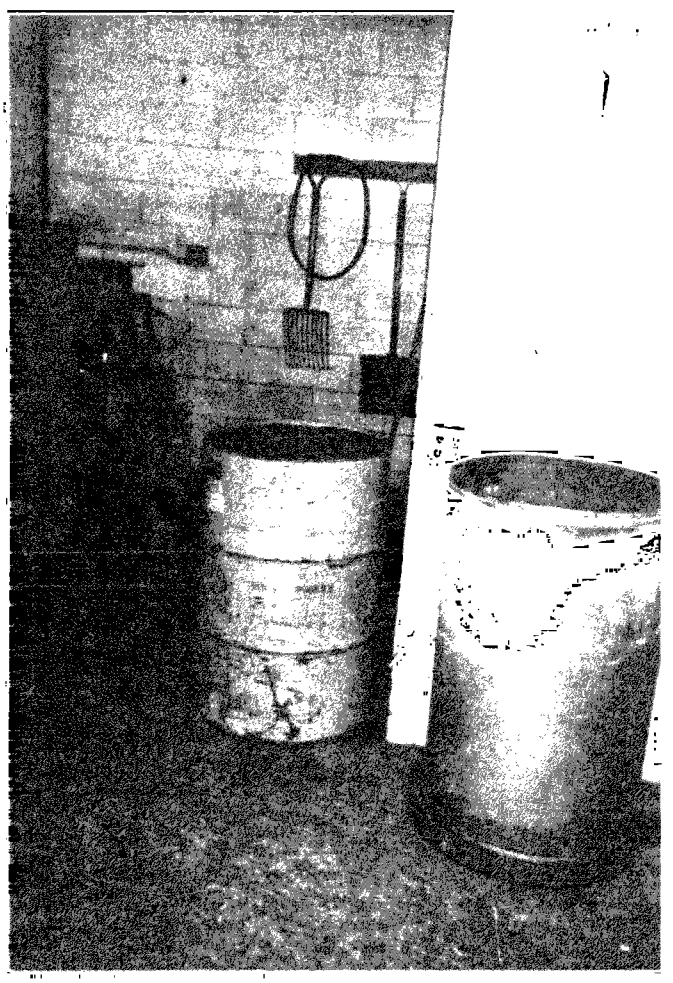
ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

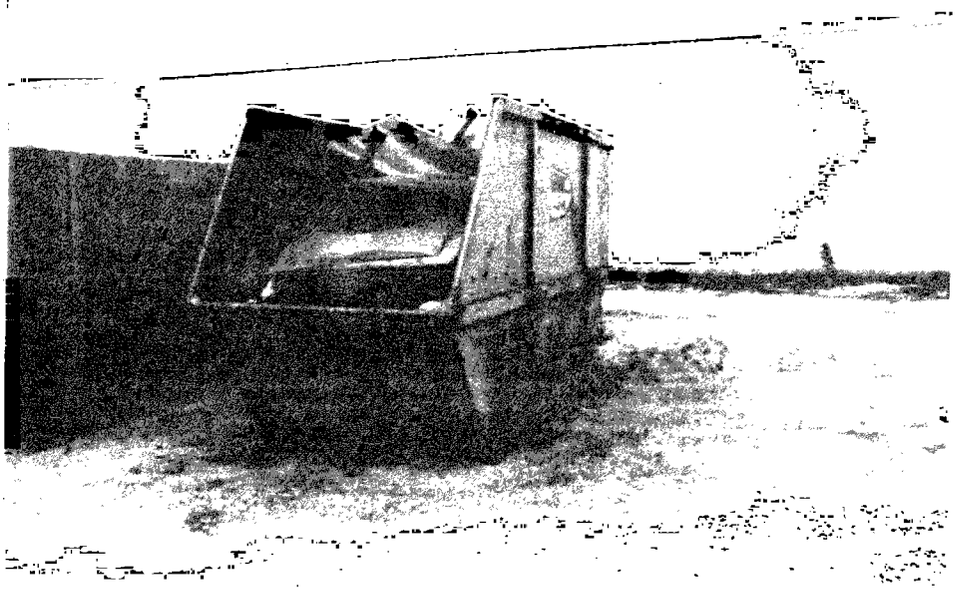
Schaefer Brush Manufacturing Company, Inc. (Schaefer)
[Formerly GTE Automatic Electric, Inc. (GTE)]
1101 South Prairie Avenue
Waukesha, Wisconsin 53187
WID 006 075 642

Date:	June 29, 1992
Primary Facility Representative:	Tony Brooks, Schaefer Operations Manager
Representative Telephone No.:	(414) 547-3500
Additional Facility Representatives:	Harold Schaefer, Schaefer President Richard Vernam, Jr., PE, AG Communication Systems, Inc. (AGCS) Environmental Engineering Manager
Inspection Team:	Tom Girman, PRC Environmental Management, Inc. (PRC) Scott J. Brockway, PRC
Photographer:	Tom Girman, PRC
Weather Conditions:	Sunny; northeasterly wind; 73°F
Summary of Activities:	The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 10:00 a.m. The inspection team toured the production and assembly area, the warehouse area, the Former Hazardous Waste Storage Area, the Scrap Metal Satellite Accumulation Drum (SWMU 2), and the Scrap Metal Storage Bin (SWMU 3). PRC attempted to determine the locations of the Former Solvent Satellite Accumulation Area (SWMU 4) and Former Degreaser Distillation Systems (SWMU 5), but no conclusive evidence of their placement in the facility existed. AGCS was unable to provide information regarding the placement of these units. PRC personnel inspected the outside of the facility for signs of release of hazardous waste constituents. The tour concluded at 11:05 a.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 11:15 a.m. PRC reinspected the facility on September 24, 1992, at which time the Used Compressor Oil Storage Container (SWMU 6) was observed.

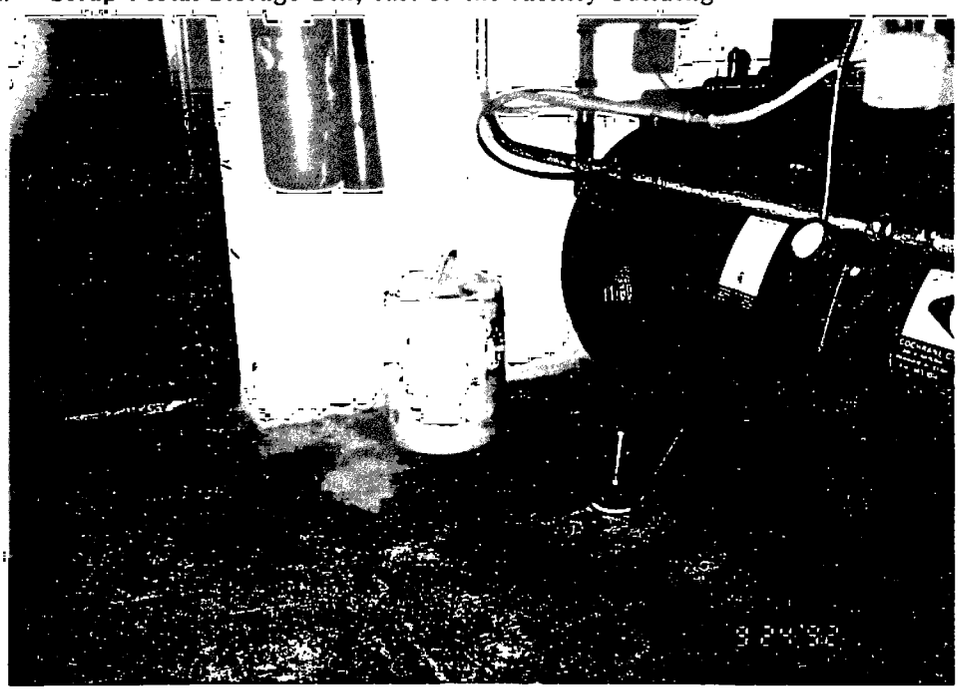
Photograph No. 1 Location: SWMU 1
Orientation: North Date: June 29, 1992
Description: Former Hazardous Waste Storage Area in the three-bay loading dock, in the southeast portion of the facility building



Photograph No. 2 Location: SWMU 2
Orientation: East Date: June 29, 1992
Description: Blue drum is the Scrap Metal Satellite Accumulation Drum of the production and assembly area



Photograph No. 3 Location: SWMU 3
Orientation: North Date: June 29, 1992
Description: Scrap Metal Storage Bin, east of the facility building



Photograph No. 4 Location: SWMU 6
Orientation: West Date: September 24, 1992
Description: Used Compressor Oil Storage Container, located on the western side of the warehouse area.

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

29 JUNE 1992 (1)

AG Comm Systems
Waukesha, WI former
GTE facility.
arrive @ 0900 meet
with Rich Vernam
(EE) out of North Lake,
IL.

Meeting 0915
Sam Backman, PRC
Tom Girman, PRC
Rich Vernam, AG Comm (GTE)
Tony Brooks, Schaefer Bush
Harold Schaefer, " "

- Heating units fueled off
gas tank tests completed
- doesn't know where
any haz. waste was
previously housed in
facility

- July 1981 closing
start of operations NOV
1982.

Brush manufacturing

3 Market - consumer maintenance
- painting, coating
- industrial brushes

wire, nylon, poly propylene
natural fibers (horse ~~hair~~ JR)
tampico

Materials set in designated
targets.

1) twisted
2) trimmed
3) stapled
4) hand drawing (sewing into
leather, metal or plastic
backing)

- no painting, coating
do use punch press
- paint booth (dipping
room) latex base
contact solution used
for the brushes
displays, maintenance
use not for commercial
use generally

Have paint thinner and
fixtures on site

Kerosene is used to
get loose dirty on wire

- Safety Kleen handles
waste paint, etc.
Parts washer exchanged on
a quarterly basis (20 gallon
unit)

(4)

- Scrap metal material in dumpster (once per year)
- Scrap nylons / plastics to landfill
- Separate degreasers.

Oil

Compressor oil changed out to 55 gallon drum disposed locally at reclamation center.

Oil changed approx on a quarterly basis.

8 to 10 gallons per change out (5 at 30W)

2 machines.

No air or water permits at facility

(5)

- No storm sewers or floor drains on site
- City water service, no known wells to exist in site.
- No USTs on site

38,900 ft² on 1.5 acres

65 employees 1 shift (have run 2 shifts) no security guard at night bldg is locked down

GTE

- 1957 a portion of building was built - Automatic Electric

GTE acquired AE or named GTE-AE

350 employees with GTE-AE

Built in three phases
~~1957~~ SJB data not known
~ 1960 a loading dock
was put on the rear of
the building

All concrete block except
for the rear which is
steel

Sprinklers in place except
for office

Previous land use not
known.

No records for air or
water permits
GE has inventory sheet,
undated, will provide
copy.

260 people were employed
at time of annexation
in 1981. Believed to
have manufactured electric
switching instrumentation

Tour
- Wire division
- Bottle brushes
- Drawing dept. tech. custom
  brush.
- SJB Shipping, receiving,
warehousing. Also have
wood, metals shop

- rust is on steel decking panels around old vent systems

- SW corner of the Building Paint Room. Space in room near overhead door used to treat wood Sealed Envelopes prior to shipping. Used hose trough ~~and~~ SJS with water based varnish (still held on site).

Latex contact solution is placed back into 5 gallon containers (unused portion) - hardened

portion disposed of in garbage dumpster.

- 3M 30-NF Contact Adhesive (green)

- Vent system in place

Photo ① paint booth

- Woodshop / Machine - used for production and maintenance

- sawdust contained + disposed of in general refuse

- gluing operation ~~on~~ SJS on ~~east~~ SJS side vented with a hood.

(10)

1025 loading dock area. SWMU (1) (see GIS info.) Unlined area constructed in ? 1980. photo (2) SWMU 1 facing North.

1030 Warehouse on east side of bldg. No real signs of production in area (what is present

1035 Metal shavings are collected in hoppers on the machine, then collected in drums for eventual disposal in metals dumpster

(11)

1036 Roof drains connected to sanitary sewer

1042 Ford printing station
1: lacquer thinner
2: ink thinner
No disposal - evaporation is rapid
ink is oil based.

1048 Raw materials kept brass, nylon, polypro, horse, pig hair

1053 OUTSIDE TOUR
East ~~South~~ of Schaefer
is SANOFI Bio Industries
(cheese enzymes)
South Akron

(12)

North - cemetery

West - magnatek

Metals dumpster SIB

~ 20 yd Sax

1058 Toured SIB east end of facility - vacant land, with vegetation (Drained into loading area) no signs of stressed vegetation.

1105 Tour ends, wrap-up

1130 WCTC on Broadway former GTE

Scott J. Bockway, PRC

Tom Gilman, PRC

Grant Van Den Heuvel, WCTC

Ron Maassen, WCTC

Tim Greene, WCTC HS

(13)

Richard Vernon, AG Comm.

1132 Intro by T. Gilman.

GTE closed July 1981

purchased by WCTC 86/87 from Genl.

major remodeling

Health Dept. on West side.

GTE leased it from Genl. WCTC leased from Genl then it was purchased.

Waukesha Co Health Dept leases from WCTC

Aug 1, 1987 5 yr lease renewal just executed.

41,000 ft², 17,000 leased to Health